

APR 1 8 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION Federal Communications Commission
 Washington, D.C. 20554 Office of Secretary

In the Matter of)
)
 Ameritech Petition for)
 Forbearance from Application)
 of Section 272 of the)
 Communications Act of 1934,)
 as Amended, to Previously)
 Authorized Services)
)

CC 96-149

AMERITECH PETITION FOR FORBEARANCE

To the extent that §272 of the Communications Act of 1934, as amended (the "Act"), would otherwise require that Ameritech provide 911 and Telecommunications Relay Services ("TRS") for the deaf with certain interLATA components through a §272 separate affiliate, Ameritech hereby requests that, pursuant to §10 of the Act, the Commission forbear from applying the requirements of §272 to those services.

In its recent order on the non-accounting safeguards applicable to the BOC provision of interLATA and manufacturing services,¹ the Commission concluded that BOCs may continue to provide "previously authorized" interLATA services without having to obtain §271 authorization from the

¹ *In the Matter of Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended*, CC Docket No. 96-149, First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-489 (released December 24, 1996) ("Non-Accounting Safeguards Order").

Commission.² However, the Commission has interpreted §272(a)(2)(B) to exempt from §272 separate affiliate requirements only those previously authorized interLATA services that are telecommunications services.³ While previously authorized interLATA information services may continue to be offered, they are nonetheless subject to the separate affiliate requirements of §272.⁴

Ameritech has been offering 911 services and TRS in a way which includes, in certain cases, interLATA links. Ameritech has previously received MFJ-related waivers to offer these services . Copies of those waiver orders and the motions of the Department of Justice supporting the waiver requests are included as attachments.⁵

In the case of 911 service, Ameritech is currently offering the service in eighty-one different situations in which the primary or emergency back-up public service answering point (“PSAP”) is in a LATA different from the one in which customers served by the PSAP are located.

In the case of TRS, Ameritech currently offers this service in the states of Michigan and Ohio via 800 numbers that connect calls from those states to

² *Id.* at ¶77.

³ *Id.* at ¶78.

⁴ *Id.* at ¶79.

⁵ The waiver for 911 services applied to all BOCs.

the TRS center without regard to LATA boundaries.⁶ Once the connection to the TRS center is established, however, the call, is routed back to the LATA of origin for completion to the called party.⁷

In both of these cases, requiring the transfer of the service to Ameritech's §272 affiliate could cause significant disruption and cost increases that would result from restructuring the service to comply with the requirements of §272.

Section 10 of the Act gives the Commission authority to forbear from applying any provision of the Act if the Commission determines that:

(1) enforcement is not necessary to ensure just and reasonable rates;
(2) enforcement is not necessary to protect consumers; (3) forbearance is consistent with the public interest. This test is met for both 911 services and TRS.

First, requiring that these services be provided through a separate affiliate is not necessary to ensure reasonable rates. 911 arrangements today are subject to state commission oversight, and there have been no allegations that that oversight is insufficient to ensure just and reasonable rates. Moreover, as indicated above, it is likely that forcing the service to be

⁶ The 800 numbers utilized by Ameritech for access to the TRS centers do not operate outside these two states.

⁷ From that point, an interLATA call would be carried by the calling party's designated IXC.

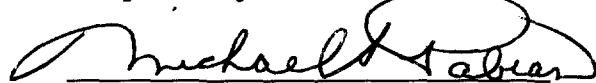
provided through the separate affiliate could result in rate increases. With respect to TRS, consumers do not pay for the service directly, but rather the charges are defrayed by a federal fund. Ameritech became the service provider in Ohio through a bid process, thus ensuring that the amounts charged to the fund would be reasonable. Similarly, in Michigan, Ameritech provides the service under the supervision of the Michigan Public Service Commission.

Second, for these very same reasons, forcing these services to be provided through a separate affiliate is not necessary to protect consumers.

Finally, to avoid potential service disruption and increased cost, forbearance is consistent with the public interest.

In light of the foregoing, Ameritech requests that, to the extent that §272 of the Act would require otherwise, the Commission forbear from applying the separate affiliate requirement to Ameritech's provision of 911 services and TRS.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Michael S. Pabian", written over a horizontal line.

Michael S. Pabian
Counsel for Ameritech
Room 4H82
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Hoffman Estates, IL 60196-1025
(847) 248-6044

Dated: April 18, 1997

Attachment A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

WESTERN ELECTRIC COMPANY,
INC., AND AMERICAN TELEPHONE
AND TELEGRAPH COMPANY,

Defendants.

Civil Action No. 82-0192-HHG

FILED

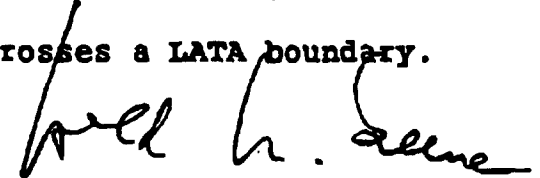
FEB 02 1989

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER

Upon consideration of the Motion of the United States for a Waiver of the Modification of Final Judgment to Permit the BOCs to Provide MultiLATA 911 Service, filed on November 17, 1988, and good cause having been shown, it is hereby

ORDERED that the United States' motion is granted and the Bell Operating Companies are permitted to provide, using their own facilities, 911 emergency service across LATA boundaries to any 911 customer whose jurisdiction crosses a LATA boundary.



HAROLD H. GREENE
United States District Judge

Dated: Feb 2, 1989.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

WESTERN ELECTRIC COMPANY,)
INC., AND AMERICAN TELEPHONE)
AND TELEGRAPH COMPANY,)

Defendants.)

Civil Action No. 82-0192-HHG

FILED

NOV 17 1988

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

MOTION OF THE UNITED STATES FOR A WAIVER OF
THE MODIFICATION OF FINAL JUDGMENT TO PERMIT
THE BOCs TO PROVIDE MULTILATA 911 SERVICE

Pursuant to sections VII and VIII(C) of the Modification of Final Judgment, 1/ the United States moves the Court to grant a waiver allowing the BOCs to provide 911 emergency service across LATA boundaries. 2/

All of the BOCs provide 911 services that enable the public to reach emergency police, fire and medical assistance by

1/ United States v. American Tel. and Tel. Co., 552 F. Supp. 131 (D.D.C. 1982), aff'd mem. sub nom. Maryland v. United States, 460 U.S. 1001 (1983).

2/ This Motion is filed in response to U S West's Request for Permission to Provide 911 Emergency Service to MultiLATA 911 Customers (October 25, 1988) ("U S West Request"). Similar requests by other BOCs would raise no new competitive issues, however, and even the "me too" waiver procedure could result in some delay in the provision of new or improved 911 services. Accordingly, the Department recommends that the Court, in addition to allowing U S West to provide interLATA 911 services without geographic limitations, grant a waiver applicable to all of the BOCs.

dialing "911." The customers for 911 services are local governmental bodies that have public safety responsibilities. The jurisdictions of some 911 customers may include areas in more than one LATA, and section II(D)(1) of the decree prohibits the BOCs from providing interLATA 911 services without a waiver.

Recognizing the importance to the public of 911 service, the Court, in 1984, granted the motion of Ameritech and four other BOCs to provide E911 service, which constitutes an information service and therefore would be prohibited by the decree in the absence of a waiver. 3/ The BOCs' memorandum in support of that motion noted that "in no more than 35 to 40 mostly rural locations" the BOCs would provide 911 service across LATA boundaries, and requested a waiver of the decree's interexchange services prohibition "in those limited instances." 4/ Neither the Department's response in support of

3/ United States v. Western Electric Co., No. 82-0192, slip op. at 2 (D.D.C. Feb. 6, 1984). The Department agrees with U S West that this order grants all the BOCs a "generic" waiver of the information services restriction to provide Enhanced 911 ("E911") service. E911 service includes a computerized data storage and retrieval system that is used to provide the caller's location and other stored data to the public safety officials.

4/ Memorandum in Support of Motion for Waivers and Declaratory Rulings, at 5 n.5 (Dec. 8, 1983).

the BOCs' motion for the E911 waiver 5/ nor the Court's memorandum granting that motion mentioned the interexchange aspect of the waiver request. In these circumstances, the Department submits, the Court's order should be construed as permitting the BOCs to continue then-existing interLATA 911 services, but we do not think that the record supports U S West's contention 6/ that the 1984 order granted a waiver covering all future interLATA 911 services.

Allowing the BOCs to provide interLATA 911 services, like allowing them to provide E911 services, however, is clearly in the public interest. It would allow consumers to reach providers of emergency services conveniently and efficiently. Moreover, BOC provision of this limited and specialized type of interLATA service does not present any threat to competition among interexchange service providers that would warrant denial under the VIII(C) standard. 7/ Indeed, the Department has received no comments objecting to the U S West request.

5/ Memorandum of the United States in Response to Pending Motions for Clarification and/or Waivers of the Decree's Provisions at 2-3 (Jan. 3, 1984).

6/ U S West Request at 3.

7/ Like time and weather services, 911 service is sui generis, and no inference can or should be drawn from this recommendation with regard to any other interexchange service. See United States v. Western Electric Co., No. 82-0192, slip op. at 6 (D.D.C. Feb. 8, 1988).

For the reasons set forth in this Motion and in the U S West request filed herewith, the Court should enter the attached proposed order granting the requested waiver for all of the BOCs.

Respectfully submitted,



Nancy C. Garrison, Assistant Chief



Michael F. Altschul, Attorney

Communications and Finance Section
Antitrust Division
United States Department of Justice
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November 17, 1988

U S WEST, Inc.
7800 East Orchard Road, Suite 480
Englewood, Colorado 80111
303 783-6304

George Ann Harding
Vice President
Associate General Counsel

U S WEST

October 25, 1988

FILED
CA 82-0192
NOV 17 1988

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Washington, D.C. 20001

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

Re: Request for Permission to Provide 911
Emergency Service to MultiLATA 911 Customers,
United States v. Western Electric Co., No. 82-0192

Dear Ms. Garrison:

U S WEST, Inc., on behalf of its three operating companies,^{1/} requests the Department to recommend to the Court that it be granted relief from the interexchange services prohibition in Section II(D)(1) of the Decree so its operating companies can, using their own facilities, provide 911 emergency service across LATA boundaries in the 14 multiLATA counties listed in Attachment A. U S WEST further requests the Department to recommend to the Court that it issue a generic waiver so that U S WEST need not seek a similar waiver each time one of its operating companies is asked to provide 911 service to a 911 customer which resides in more than one LATA.

Background

911 service enables the public to dial "911" to reach easily and quickly emergency police, fire and medical assis-

^{1/} The Mountain States Telephone and Telegraph Company, Northwestern Bell Telephone Company and Pacific Northwest Bell Telephone Company (collectively, "U S WEST").

tance. U S WEST's operating companies actually offer four different 911 services, which are described in Attachment B.

911 service is generally perceived to be a local service. It is provided pursuant to state exchange tariffs (or by contract where permitted by a state commission), and the 911 service area is confined to the political boundary of the 911 customer, generally a county or municipality.

For the most part, the LATAs are sufficiently large that no Decree issues are implicated when U S WEST provides 911 service. Nevertheless, there are instances in which the jurisdictional boundary of a 911 customer crosses a LATA boundary -- in which case 911 calls placed in one LATA will be directed to a Public Safety Answering Point ("PSAP") located in another LATA. See Figures 1 and 2. The provision of 911 service in these limited circumstances constitutes an interexchange service within Section II(D)(1) of the Decree.^{2/}

U S WEST has about 60 multi-LATA counties in its 14-state, 27-LATA service area. As part of U S WEST's implementation of the pending Civil Enforcement Consent Order,^{3/} it was recently discovered that there are 13 locations where U S WEST, since divestiture, has begun to provide 911 service within a county but across a LATA boundary. U S WEST has also been asked to provide county-wide 911 service in Park County, Colorado, which traverses two LATAs.^{4/} These 14 locations are identified in Attachment A.

The Decree Court has already approved the provision of 911 service to multiLATA 911 customers. On February 6, 1984 the Court granted U S WEST (and others) a waiver so it could continue to provide 911 service. Although the principal focus of this waiver was the information services restriction in connection with the provision of E911 service, U S WEST (and the other petitioners) had also requested relief from the interexchange services restriction:

^{2/} 911 customers have difficulty understanding that their local telephone company, which provides telephone service to all county residents, may not transport a 911 call from one part of the county to another because the county is in two LATAs.

^{3/} See Motion and Stipulation for Entry of Civil Enforcement Consent Order (Nov. 20, 1987).

^{4/} U S WEST has previously submitted to the Department a waiver request concerning Park County. See Letter from Jeffrey Bork to Nancy Garrison (July 26, 1988). U S WEST wishes to consolidate that specific request so the Department can present to the Court a single motion addressing all 911 issues.

[I]n no more than 35 to 40 mostly rural locations, the BOCs' provision of 911 service will require that some 911 calls placed in one LATA will be directed to a Public Safety Answering Point in another LATA.^{5/}

At the time, U S WEST was providing multiLATA 911 service in two counties: Pine County, Minnesota (Minneapolis and Duluth LATAs); and Lewis County, Washington (Portland and Seattle LATAs).

It is not entirely clear from the record whether the Court's February 6, 1984 Order was generic in nature or whether it was limited in scope to the 911 services being offered at the time of divestiture. The request was so non-controversial that neither the Department nor anyone else addressed it in their responsive pleadings. Likewise, the Court did not specifically reference this particular request, providing simply that the BOCs may offer 911 emergency service. It is clear from the record, however, that the Court did not expressly limit the waiver to embedded 911 systems. It is also clear from the record that the information services waiver the Court granted was generic in scope.^{6/}

U S WEST believes that the February 6, 1984 Order can be construed as granting all BOCs a generic waiver to provide multiLATA 911 service. Nevertheless, reasonable people may disagree with this conclusion. Accordingly, in the hope of expediting entry of the relief necessary to provide this important public service, U S WEST submits this waiver request.

The Public Interest Would Be Served By
Grant of a Waiver

The provision of 911 service, whether provided before or after post-divestiture, unquestionably furthers the public's welfare. In fact, the FCC has held that the provision of 911 service "directly promotes" the Congressional directive in Section 1 of the Communications Act of "promoting safety of life and property through the use of wire and radio communica-

^{5/} Memorandum in Support of Motion for Waivers and Declaratory Rulings, at 5 n.5 (Dec. 9, 1983). See also Motion of Pacific Telephone and Nevada Bell for Clarification and Rulings, at 4 ¶ 4 (Dec. 14, 1983).

^{6/} There is, therefore, no need for U S WEST to seek a waiver of the information services restriction each time one of its operating companies installs a new E911 system.

tions."^{7/} The Court, too, stated in its February 6, 1984 Order approving the multiLATA 911 waiver requests before it:

The Court finds that the relief requested by these motions will serve the public interest by avoiding expensive reconfigurations and unnecessary disruption of telephone service, will not endanger competition and is consistent with the purposes of the decree.^{8/}

The provision of multiLATA 911 service is of considerable importance to state and local governments. For example, on October 10, 1988 the Emergency Management Division of the State of Oregon conducted a meeting to "resolv[e] the problem which inter-LATA transport regulations create for 9-1-1 emergency telephone service":

In Oregon, we have at least six such areas, two of which are significant enough in circuit cost alone to threaten the completion of our legislatively mandated implementation effort. The problem must be resolved. We anticipate everyone's cooperation in helping to identify a satisfactory solution.^{9/}

U S WEST's provision of multiLATA 911 service will necessarily be limited in scope to those few locations where the jurisdictional boundary of a potential 911 customer crosses a LATA boundary.^{10/} The provision of multiLATA 911 service in these locations will neither inhibit U S WEST's incentive to provide equal access nor otherwise undermine the purposes for the interexchange services restriction -- avoidance of discrimination and cross-subsidization.^{11/}

^{7/} CPE Used in Conjunction with 911 Service, ENF 84-44, Mimeo No. 1709, at ¶ 16 (Jan. 8, 1985).

^{8/} Memorandum of February 6, 1984, at 2.

^{9/} Notice of Meeting (Sept. 26, 1988)(emphasis in original). See Attachment C.

^{10/} At this time, there appear to be about 40 other locations in U S WEST's service area where U S WEST could be asked to provide multi-LATA 911 service. See Attachment D. All of these areas are rural, and the number of interLATA circuits needed to service these potential customers are few (e.g., generally two circuits per customer).

^{11/} See United States v. Western Electric Co., 569 F. Supp. 1057, 1100 n.187 (D.D.C. 1983).

U S WEST should, moreover, be permitted to use its own facilities in the provision of multi-LATA 911 service. 911 customers are interested in two things from their 911 service provider: emergency service that is reliable and inexpensive.^{12/} In those locations where U S WEST has inter-office facilities crossing the LATA boundary within the 911 service area (e.g., EAS situations), the most economical way to provide multi-LATA 911 service is to use those U S WEST facilities. See Figure 3.

In many locations, however, U S WEST does not have any embedded facilities which directly cross the LATA boundary in the 911 service area. It is generally not economical to build such facilities given the small number of circuits required to provide 911 service. Consequently, in these locations a 911 call originating in the non-PSAP LATA must be routed to the access tandem switch serving the originating end office and transported to an access tandem switch in the PSAP LATA for delivery to the PSAP. See Figure 4.

Two types of facilities can be used to transport the 911 call from one U S WEST tandem switch to the other: U S WEST's official services network,^{13/} or circuits provided by a third party (e.g., an interexchange carrier) and obtained pursuant to tariff or other special contractual arrangement. If third party facilities are used, the 911 customer may deal directly with the third party (in which case, no Decree issues are implicated),^{14/} or U S WEST may act as an overall coordinator for the interLATA transport of the 911 services (in addition to the intraLATA transport) so the 911 customer need deal with only one carrier when troubles or outages occur.

U S WEST currently uses both types of facilities in its provision of 911 services. 911 customers often prefer U S WEST official services facilities because U S WEST can generally provide more reliable service and, at times, more economical interLATA transport.^{15/} Moreover, some 911 customers currently

^{12/} 911 service, the FCC has stated, entails "extraordinary requirements for service continuity, reliability and maintenance." See note 7 supra. The cost for 911 service is, of course, paid by the 911 customer's citizens through taxes.

^{13/} Official services facilities may consist of U S WEST-owned facilities or facilities which U S WEST leases from others.

^{14/} See Memorandum Order dated June 28, 1985 (PNB/State of Oregon decision).

^{15/} For example, AT&T quoted to Park County, Colorado a monthly fee of \$4,000 to lease two dedicated interLATA circuits (Continued on page 6)

using interLATA facilities provided by a third party have asked U S WEST to instead use its own interLATA facilities.

The Decree Court has authorized BOCs to use their own facilities in transporting traffic across LATA boundaries in a variety of contexts.^{16/} For example, the extended area service and corridor exceptions to the interexchange services prohibition were approved in large measure to avoid increasing the costs of providing services that would occur by abandoning embedded BOC facilities in favor of third party facilities.^{17/} This rationale suggests that where U S WEST has embedded facilities that cross the LATA boundary intersecting a 911 service area, it may use such facilities in its provision of multiLATA 911 service.

Similarly, in its opinion addressing BOC official services, the Court held that it "makes no sense" to prohibit the BOCs from using, constructing and operating their own interLATA facilities in the conduct of their official services:

Speed and reliability are critically important with respect to the BOCs' monitoring and con-

^{15/} (Continued from page 5)

so U S WEST could provide 911 service in Park County. If U S WEST were to use its own official service network between its Denver and Colorado Springs tandem locations (facilities that are currently leased from AT&T pursuant to SNFA), it would be able to charge Park County only \$300 monthly for two circuits. (The cheaper rate is possible because U S WEST obtains facilities from AT&T at a bulk rate and because U S WEST can base its rate using a "cost plus contribution" method.)

A monthly fee of even \$300 is large for Park County which has only 6,000 residents. It is for this reason that Park County is considering the remote call forwarding option of B911 service. This latter option would not, of course, implicate the interexchange restriction of the Decree.

^{16/} The only situation where a BOC must use the interLATA facilities of a third party is in connection with mobile radio services. See United States v. Western Electric Co., 578 F. Supp. 643, 652 (D.D.C. 1983). However, the Court never analyzed the issue in that proceeding because the BOCs had agreed to lease all interLATA facilities. Id. at 651-52 and n.38. In fact, the Court held that the BOCs "may, of course, seek permission at a later date to construct their own inter-LATA transmission facilities for their mobile radio systems." Id. at 652 n.39.

^{17/} See United States v. Western Electric Co., 569 F. Supp. 990, 1002 n.54, 1018-19, 1023 (D.D.C. 1983).

trolling of their switches and trunks. BOC operating personnel and computers must have continuous, instantaneous information regarding traffic loads and the operating state of equipment. When traffic overloads or equipment malfunctions occur, they must have the capability to immediately control equipment and reroute traffic. Forcing the BOCs to rely on third parties for official service communications . . . could seriously jeopardize the BOCs' fulfillment of their responsibilities to provide intra-LATA communications and exchange access.^{18/}

U S WEST's transport of a 911 call from the caller to the PSAP is not an official service. Nevertheless, the reasons for allowing the BOCs to use their own interLATA facilities in connection with official services are equally (if not more) compelling when applied to the provision of 911 service. Speed and reliability are critically important in 911 service. If U S WEST is forced to use facilities provided by a third party, its ability to monitor quality and traffic loads and to provide continuous service is hampered. Among other things, down time may be encountered as U S WEST and the interLATA transport provider coordinate their effort to isolate and fix reported troubles or outages. Conversely, if U S WEST is allowed to use its own facilities, it can simply use different circuits during the investigation of any trouble. Simply put, forcing U S WEST to rely on third parties for the interLATA transport of 911 service could jeopardize the provision of reliable, and uninterrupted, 911 emergency service.

In summary, U S WEST asks the Department to recommend to the Court that it may provide multiLATA 911 services in the 14 locations listed in Attachment A and that it may use its own facilities in the interLATA transport of 911 calls.

The Department Should Recommend that
the Court Issue a Generic Waiver

U S WEST has recently ascertained that it has about 60 multi-LATA counties in its 14-state, 27 LATA service area. See Attachment D. As evidenced by the Park County waiver U S WEST filed on July 26, 1988,^{19/} it is likely that U S WEST will be

^{18/} United States v. Western Electric Co., 569 F. Supp. 1057, 1098, 1099 (D.D.C. 1983).

^{19/} See note 4 supra.

asked to provide 911 service to other multiLATA customers. U S WEST therefore recommends that, if a waiver is required, the Department present to the Court a generic waiver so that U S WEST need not request a waiver each time a new multiLATA 911 service order is placed. The Department's reasons for recommending to the Court that it issue a generic waiver in connection with multi-LATA paging services are equally applicable to 911 service: "Continuing this type of detailed judicial oversight for geographically incremented waivers would only burden the Court, the Department, and the BOCs and delay the provision of new and improved services."20/

Feel free to contact me or Jeff Bork in our Washington office (202-429-3122) if you have any questions concerning this request.

Sincerely,

George Ann Harding 

cc: Michael F. Altschul, Esq.

Persons listed in the attached Service List

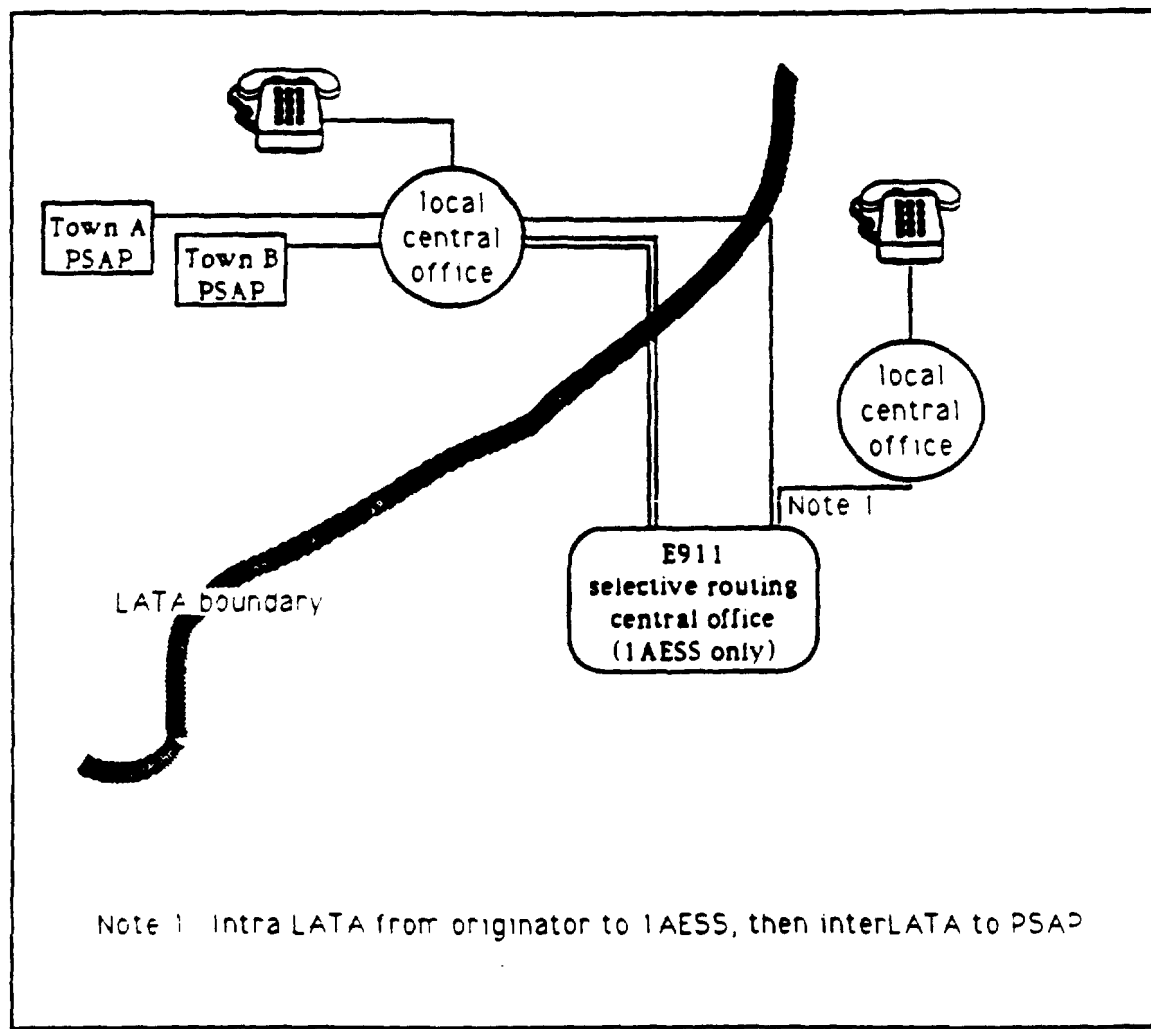
20/ Motion of the United States for a Waiver of Section II(D) of the Modification of Final Judgment to Permit Bell Operating Companies to Provide MultiLATA Paging Services, at 6 (Sept. 15, 1988).

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CA 82-0192
NOV 17 1988

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DISTRICT OF COLUMBIA

Figure: 1

Intra and interLATA E911 service (one of two variations).

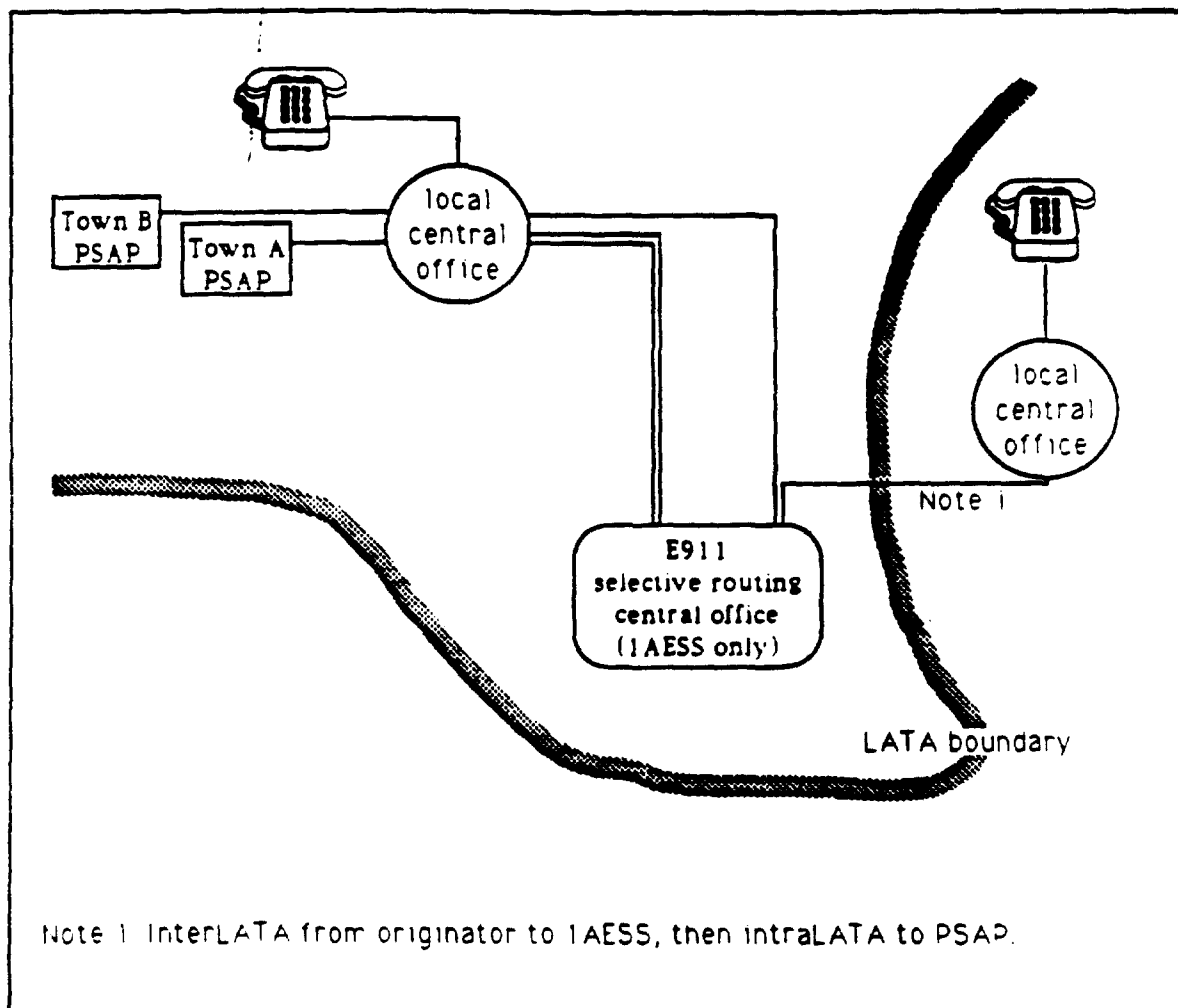


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DISTRICT OF COLUMBIA

Figure: 2

Intra and interLATA E911 service (second of two variations).

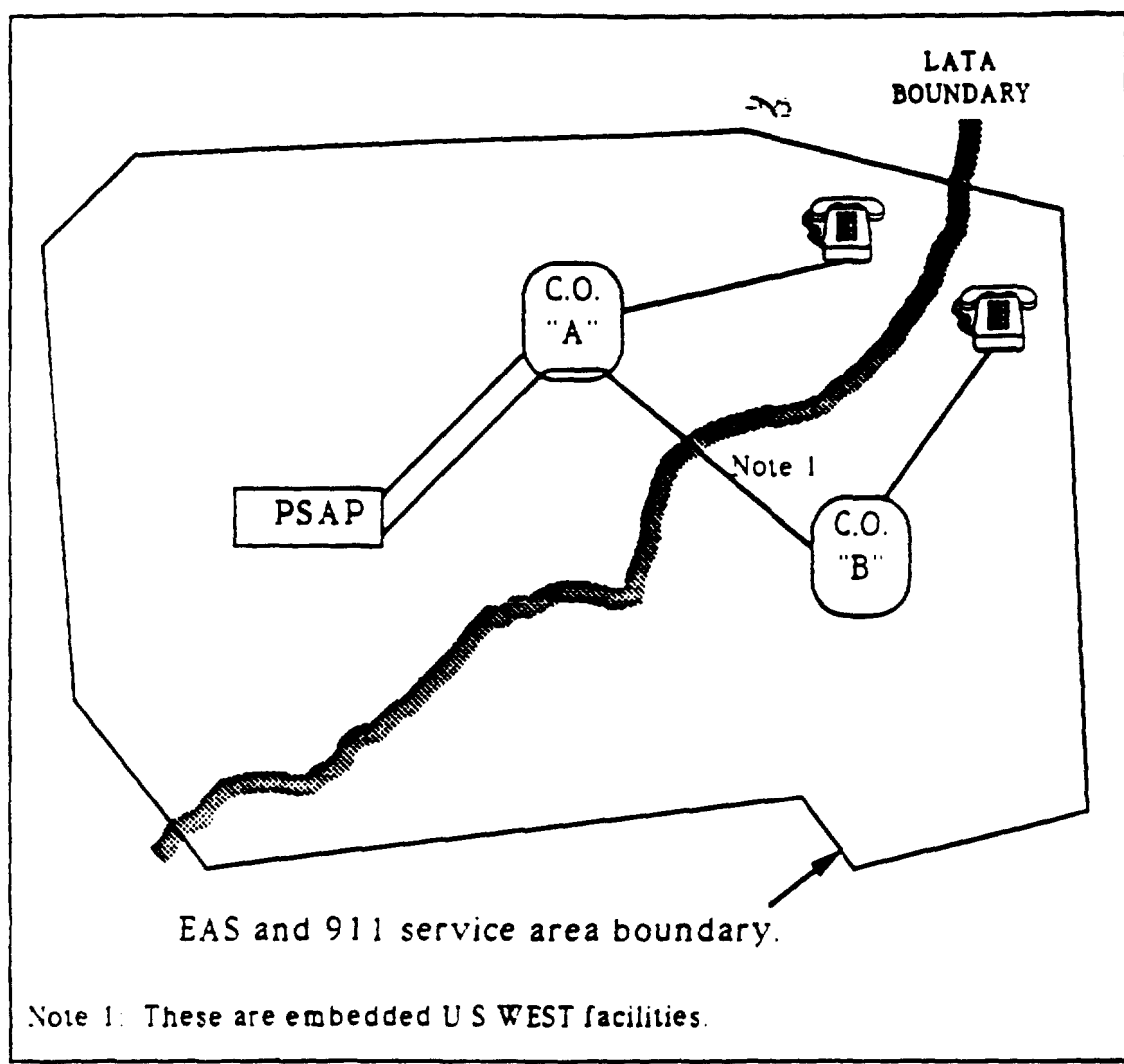


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Figure: 3

911 in an "EAS" (Extended Area Service) area.

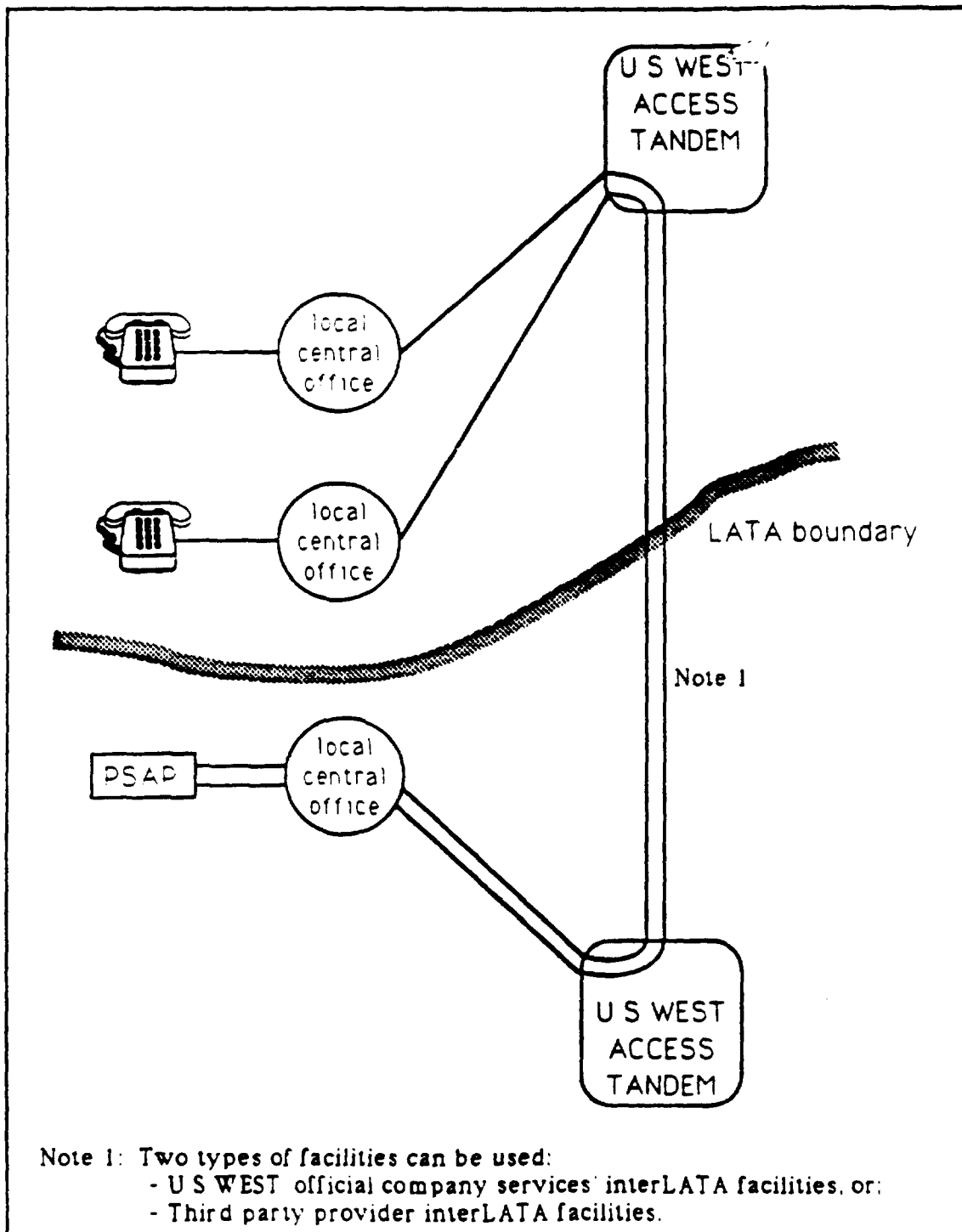
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Figure: 4
InterLATA transport options.



ATTACHMENT A

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NOV 17 1988

MULTILATA 911 SYSTEMS (14)

CLERK, U.S. DISTRICT COURT,
DISTRICT OF COLUMBIA

<u>COUNTY</u>	<u>PSAP's LATA</u>	<u>OTHER LATA</u>
Colorado (1) Park	Colorado Springs	Denver
Minnesota (13) Aitkin	Brainerd/Fargo	St. Cloud & Minneapolis
Crow Wing	St. Cloud	Minneapolis
Douglas	St. Cloud	Brainerd/Fargo
Goodhue	Minneapolis	Rochester
Koochiching	Duluth	Brainerd/Fargo
LeSueur	Minneapolis	Rochester
Mille Lacs	St. Cloud	Minneapolis
Morrison	St. Cloud	Brainerd/Fargo
Renville	St. Cloud	Rochester
Sherburne	Minneapolis	St. Cloud
Sibley	Minneapolis	St. Cloud
Wabasha	Minneapolis	Rochester
Yellow Medicine	St. Cloud	Rochester

U S WEST
October 25, 1988

Attachment B

Description of 911 Services

911 service enables the public to dial "911," without charge, to reach easily and quickly emergency police, fire and medical assistance. The potential customer base for 911 service consists of local governmental bodies (e.g., counties, cities) which are interested in providing 911 service to their citizens.^{1/}

Introduced in 1968,^{2/} 911 service has evolved over the years to meet the public's need for emergency assistance. Originally, 911 service simply provided network call routing to a single Public Safety Answering Point ("PSAP") designated by

^{1/} Indeed, U S WEST's tariffs specify that to obtain 911 services, "[t]he 911 customer must be legally authorized to subscribe to the service and have public safety responsibility by law to respond to public emergency calls within the telephone central office areas arranged for 911 calling." Mountain Bell, Utah Exchange and Network Services Tariff, § 9.2.1.A.2.

^{2/} A 1967 report by a Presidential Commission stated that "[w]herever practical a single [emergency] number should be established, at least within a metropolitan area and preferably over the entire United States." President's Commission on Law Enforcement and Administration of Justice, The Challenge of Crime in a Free Society 29 (1967). In January 1968, in response thereto, AT&T announced that the digits "911" would be available, as a matter of Bell System-wide policy, to serve as the universal emergency telephone number.

the 911 customer.^{3/} However, the size and complexity of the emergency services provided today by municipalities and counties have warranted the provision of additional features of 911 service to serve the public more effectively.

U S WEST today offers four different 911 services, each of which is described below.

1. Basic 911 (B911) Service

The original and most basic 911 service is B911. With B911 service, U S WEST reprograms its end office switches so that a calling party can reach a designated PSAP simply by dialing "911" instead of a seven-digit local telephone number. There are no features with B911 service other than abbreviated dialing.

Ordinarily, B911 service uses a "hard-wired" dedicated facility (or trunk) between the end offices in the 911 service area and the PSAP. However, 911 customers also have the option of using switched facilities to the PSAP in those locations where U S WEST can provide remote call forwarding.^{4/} The

^{3/} While U S WEST may provide the CPE used by the PSAP attendant, the 911 customer decides where to locate the PSAP and staffs the 911 console.

^{4/} Call forwarding, which can be provided in most stored program controlled switches, permits a customer to have calls routed to a number different than the number dialed by the caller. In 911 service, a 911 call is routed to an end office switch equipped with call forwarding capability where the digits "911" are translated into the conventional telephone number of the PSAP.